

Message

From: McFadden, Kelly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6359F43A4E0D4816B98EBD00AE545067-MCFADDEN, KELLY]
Sent: 11/15/2018 8:56:11 PM
To: Michael.Simon@deq.idaho.gov
Subject: R10 toxics work in Idaho
Attachments: IDEQ Air Toxics 11-15-18.xlsx

Mike,

Sorry about the mix up with the NSPS/NESHAPs chart of pending and completed work. The chart was completely messed up when someone forgot to sort the entire data set (and not just the column). Anyway here is the data for ID.

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From: Michael.Simon@deq.idaho.gov <Michael.Simon@deq.idaho.gov>
Sent: Tuesday, September 25, 2018 1:31 PM
To: McFadden, Kelly <McFadden.Kelly@epa.gov>
Subject: RE: Air Toxics Workload and Adjacency Guidance

Thanks!

Also, looks like there are a number of incorrectly assigned ones for the state of Idaho. For example, the Hampton Lumber Mills Boiler MACT is in WA, not ID.

Thx, Mike

From: McFadden, Kelly [<mailto:McFadden.Kelly@epa.gov>]
Sent: Monday, September 24, 2018 4:54 PM
To: Michael Simon
Subject: Air Toxics Workload and Adjacency Guidance

Mike,

Attached is an updated spreadsheet of the pending applicability determinations (and completed ones) in ID.

Also included is a link to the "Adjacency" Guidance that is currently out for public comment (Sept 4 – Oct 5th). New Source Review and title V operating permit programs apply to "stationary sources" where emissions exceed established thresholds. To determine what comprises a source, three factors must be satisfied: The operations must be under common control; they must be located on contiguous or adjacent properties; and they must fall under the same major standard industrial classification (SIC) code. In this guidance, for all industries other than oil and natural gas production and processing, the EPA provides an interpretation of adjacent that only considers physical proximity. The concept of functional interrelatedness would not be considered when determining whether operations that satisfy the common control and SIC code criteria, and do not lie on contiguous property, are adjacent. The draft guidance and a link for submitting comments is available at: <https://www.epa.gov/nsr/forms/interpreting-adjacent-source-determinations>.

Thank you for volunteering to be part of our electronic permit system pilot. I'm hoping that it will streamline your requests to EPA for permit reviews.

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